

Fact Sheet



For Final Renewal Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100009-2007**
Application Received: **December 18, 2006**
Plant Identification Number: **041-00009**
Permittee: **Equitrans, L.P.**
Facility Name: **Copley Run Compressor Station #70**
Mailing Address: **Route 4, Box 640 Weston, WV 26452**

Physical Location: Weston, Lewis County, West Virginia
UTM Coordinates: 541.30 km Easting • 4314.80 km Northing • Zone 17
Directions: Interstate 79 to Exit 91. Proceed toward Weston for approximately 1 mile, take a left onto Copley Road (Route 17). The station is approximately ½ mile on the left.

Facility Description

Copley Run Compressor Station #70 is a natural gas transmission facility covered under Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week. This station consists of three (3) 1350 hp compressor engines, one (1) 2250 hp compressor engine, one (1) 1800 hp compressor engine, two (2) 2.2 MMBtu/hr natural gas fired electric generators, two (2) triethylene glycol dehydration units, one (1) flare and six (6) tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	172.47	74.35
Nitrogen Oxides (NO _x)	871.03	602.88
Particulate Matter (PM ₁₀) <i>PM₁₀ is a component of TSP.</i>	12.66	1.955
Total Particulate Matter (TSP)	12.66	1.955
Sulfur Dioxide (SO ₂)	0.17	0.119
Volatile Organic Compounds (VOC)	38.48	15.00

Hazardous Air Pollutants	Potential Emissions	2005 Actual Emissions
Benzene	0.741	0.161
Ethylbenzene	0.254	0
Formaldehyde	15.16	12.594
Hexane	0.309	0.116
Toluene	1.146	0.608
Xylene	1.576	1.523

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 172.47 tons per year of Carbon Monoxide, 871.03 tons per year of Nitrogen Oxides, and 15.16 tons per year of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Equitrans, L.P. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity and PM limits for fuel burning units
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review Permit requirements
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
State Only:	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to request any pertinent information such as annual emission inventory reporting is provided in WV Code § 22-5-4(a)(14). The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2397B	May 7, 2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit. The following are changes that were made since the original Title V Permit was issued:

The requirements to conduct, and maintain records of, visible emissions testing for the indirect heat exchangers were removed in accordance with 45CSR§2A-3.1.a., which exempts natural gas combustion sources from such testing and recordkeeping.

The WVDEP has determined that 45CSR10 is not applicable to the engines, therefore the requirements to analyze the inlet gas stream for total sulfur and H₂S to demonstrate compliance with 45CSR10 were removed. In addition, pipeline quality natural gas has very low sulfur content, and total sulfur includes H₂S, therefore it is no longer required to analyze the inlet gas stream for total sulfur and H₂S for the dehy flare to demonstrate compliance with 45CSR10.

The facility requested a New Source Review Permit modification, R13-2397B, to resolve an outstanding issue regarding the applicability of 40 CFR Part 63, Subpart HHH. Equitrans acknowledges that the Copley Run Compressor Station is a major source of HAPs, however 40 CFR §63.1274(d)(2) exempts sources if the actual average benzene emissions from the glycol dehydration unit process vents are less than 1.0 ton/yr. In order to make these benzene limits federally enforceable, Equitrans has applied for a permit modification under 45CSR13.

Permit R13-2397B, Condition 4.1.2.f. requires the Dehy Flare to be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. 45CSR§6-4.3. requires incinerators to limit opacity to less than 20%. Both conditions are applicable and were included in the permit. This means the Dehy Flare opacity must be limited to no visible emissions, except for 5 minutes during 2 hours where the opacity must not exceed 20%.

It has been determined that the monitoring, testing, recordkeeping, and reporting requirements in Permit R13-2397B are acceptable for Title V purposes to demonstrate compliance, and all conditions were carried over into the Title V Permit.

40 CFR part 63 Subpart HHH. Permit R13-2397B exempts the dehydration units from Subpart HHH in accordance with 40 CFR §63.1274(d)(2) by limiting the benzene emissions. The owner or operator must monitor actual average benzene emissions in accordance with 40 CFR §63.1282(a)(2), which requires the use of GLYCalc Version 3.0 or higher. However, Condition 4.3.1. of Permit R13-2397B requires the use of GLYCalc Version 4.0 or higher, therefore the monitoring requirement of 40 CFR §63.1282(a)(2) was streamlined with Condition 6.3.1. of the Title V Permit. The owner or operator must maintain records of the benzene emissions in accordance with 40 CFR §63.1284(d).

40 CFR 64 - Compliance Assurance Monitoring (CAM). The engines, generators, boilers and storage tanks do not have control devices and are not subject to CAM in accordance with 40 CFR §64.2(a)(2). Dehy #2 (004-02) incorporates a process design by which exhaust gases from the reboiler are reintroduced into the dehy's reboiler system for the primary purpose of providing combustion fuel for the reboiler. As the reboiler is inherent process equipment necessary for the functional operation of the dehydration unit, and was not designed as an add-on control device, its operation does not constitute a control device under CAM. Therefore, Dehy #2 is not subject to CAM.

Dehy #1 (004-01) has pre-controlled potential emissions that exceed major source thresholds for volatile organic compounds (VOC) and hazardous air pollutants (HAPs), and is equipped with a flare that is used to comply with federally-enforceable emission limits associated with the dehy operation. Therefore, Dehy #1 represents two pollutant specific emissions units (PSEUs), one for volatile organic compounds (VOC) and one for hazardous air pollutants (HAPs). Since one control device is common to both PSEUs, one monitoring plan was submitted in accordance with 40 CFR §64.4(f). The submitted plan meets the requirements of the CAM rule for the Dehy #1 (004-01) flare controlling VOCs and HAPs from the dehydration unit.

Monitoring per the CAM Plan for VOC and HAPs emissions will be as follows:

		Indicator No. 1
I.	Indicator	Presence of Flame (permit condition 6.1.4.g.)
	Monitoring Approach	Use of thermocouple, infrared device, or equivalent (permit condition 6.2.2.).
II.	Indicator Range or Designated Condition	Indicator provides data regarding presence or absence of flame.
III.	Performance Criteria	A thermocouple, infrared detector, pilot eye, or equivalent device will be installed to continuously monitor the presence of a pilot flame (permit condition 6.2.2.).
	A. Data Representativeness	
	B. Verification of Operational Status	All manufacturer's recommendations regarding periodic testing/checks for the proper installation and operation of the pilot eye device will be followed (permit condition 6.4.1.).
	C. QA/QC Practices and Criteria	For the device that detects the presence of a flame, calibration, maintenance and operation will be conducted in accordance with manufacturer's specifications (permit condition 6.4.1.).
	D. Monitoring Frequency	Continuously
	Data Collection Procedures	Records of all flame outs or loss of pilot eye, along with any applicable corrective actions will be documented and maintained (permit condition 6.4.4.).
	Data averaging periods	No averaging periods

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR part 60 Subpart Dc	The boilers at Copley Run station are below 10 mmBtu/hr.
40 CFR part 60 Subpart GG	There are no turbines at Copley Run station.
40 CFR part 60 Subparts K, Ka	All tanks at Copley Run station are less than 40,000 gallons in capacity.
40 CFR part 60 Subpart KKK	Copley Run station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 CFR part 60 Subpart LLL	There are no sweetening units at Copley Run station.
40 CFR part 60 Subpart IIII	The engines at Copley Run Station are not stationary compression ignition (CI) internal combustion engines (ICE).

40 CFR part 63 Subpart HH

Copley Run station is not a production facility.

45 CSR 27

Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: May 2, 2007

Ending Date: June 1, 2007

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478